

THE LAW OFFICE OF THUY Q. PHAM

Via ECF

March 24, 2023

Hon. Philip M. Halpern,
United States District Judge, Southern District of New York

RE: Doe v. Martucci, et al., No. 20 CV 2331 (PMH),
Joint Letter to Meet and Confer to Reduce 33 pages to 25 pages

Dear Judge Halpern:

According to the Judge's Order (ECF

response to Defendants' pre-motion letter in ac

referred to herein by March 27, 2023, together w

Statement with Responses." Please be advised

with Responses is 33 pages long. Plaintiff write

one week to produce a joint statement of facts

After meeting and conferring for one week, Pla

Application granted. The parties' 25-page Rule 56.1 Statement with Responses shall be filed by March 31, 2023, and Plaintiff's response to Defendants' letter-motion shall be filed by April 7, 2023.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
March 27, 2023

56.1 Statement with Responses within twenty-five pages by March 31, 2023. Plaintiff will respond with a five-page letter motion by April 7, 2023. This will keep to Your Honor's time frame for a conference on April 19, 2023. The parties believe that through further discussions, the 25-page limit can be met by the removal of assertions that are immaterial, disputed, or duplicative.

In the alternative, if Your Honor accepts the 33-page Rule 56.1 Statement with Responses, Plaintiff is prepared to respond with a five-page letter motion on March 27, 2023, per this Court's order, together with a single document representing the 33-page Rule 56.1 Statement with Responses.

Respectfully submitted,

/s/ Thuy Q. Pham

Thuy Q. Pham, Esq.

The Law Office of Thuy Q. Pham

Cc: Defendants' Counsel via ECF